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**MEMORANDUM ENDORSED**

March 2, 2025

Via ECF

Hon. Gregory H. Woods,  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: **Lambert, et al v. New Start Capital, et al; Docket No.: 1:24-cv-8055 -**  
**Consent Letter Seeking Extension of Time & Modified Briefing Schedule**

Dear Judge Woods:

We represent Plaintiffs Alana Lambert, Erica Wiltz, Kimarah LeRouge, and Omnaya Abouzaid (“Plaintiffs”) on behalf of themselves and a putative class in the above-referenced matter.

In compliance with Rule 1(E) of the Court’s Individual Practice Rules, Plaintiffs are respectfully seeking a two-week extension of time to submit their motion for leave to amend the complaint, from March 7, 2025, to March 21, 2025. Defendants New Start Capital LLC, Robert Russini, and Dani Adelstein (collectively, “Defendants”)<sup>1</sup> consent to this request. A two-week extension is necessary since attorney Jennifer Calamia is no longer with Bell Law Group, PLLC; consequently, additional time is needed for the briefing of Plaintiffs’ motion for leave to amend the complaint.

Additionally, in compliance with this Court’s directive, the parties have met and conferred regarding the issue of Plaintiffs’ redacted exhibits to the First Amended Complaint (“FAC”), and after much debate, Plaintiffs will be submitting the unredacted versions of the FAC exhibits to the Defendants on Monday, March 3, 2025. Accordingly, if the Court were to grant Plaintiffs’ extension request, Defendants request an extension of time to submit their motion to dismiss Plaintiffs’ FAC and compel arbitration from March 3, 2025, to March 7, 2025, to allow Defendants time to review the impact of the unredacted exhibits on their motion.

This is the parties’ first request for an extension of the briefing schedule set forth by this Court on February 7, 2025. (Dkt. No. 54).

If the Court were to grant the within request, the parties respectfully request that the briefing schedule set forth by this Court on February 7, 2025, be modified as follows:<sup>2</sup>

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<sup>1</sup> Defendant Phil Stein has not yet appeared in this action.

<sup>2</sup> This proposed modification accounts for both counsel’s scheduled vacations in March and April 2025, for the observance of Passover/Easter.

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<b>Deadlines: Motion 1</b>	<b>Current Deadline</b>	<b>Proposed Deadline</b>
Defendants' motion to dismiss and compel arbitration	March 3, 2025	March 7, 2025
Plaintiffs' opposition to Defendants' motion to dismiss/compel	March 24, 2025,	April 11, 2025
Defendants' reply	March 31, 2025	April 21, 2025

<b>Deadlines: Motion 2</b>	<b>Current Deadline</b>	<b>Proposed Deadline</b>
Plaintiffs' motion to amend complaint	March 7, 2025	March 21, 2025
Defendants' opposition and cross-motion to compel arbitration	April 4, 2025	May 2, 2025
Plaintiffs' reply in support of their motion and opposition to Defendants' cross-motion	April 25, 2025	May 16, 2025
Defendants' sur-reply in opposition to Plaintiffs' motion and reply in support of Defendants' cross-motion	May 9, 2025	May 23, 2025

We thank the Court for its attention to this matter.

Respectfully,

BELL LAW GROUP, PLLC

Chaya M. Gourarie  
 Chaya M. Gourarie, Esq.

cc: All Counsel of Record (via ECF)

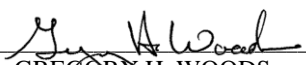
Application granted in part. The parties' requests for modifications to the briefing schedules set forth in the Court's February 7, 2025 order, Dkt. No. 55, are granted in part. The briefing schedule for Defendants' motion to dismiss the operative complaint and to compel arbitration is modified as follows: Defendants' motion to dismiss the operative complaint and to compel arbitration is due by March 7, 2025; Plaintiffs' opposition is due five weeks after the date of service of Defendants' motion; and Defendants' reply, if any, is due ten days after the date of service of Plaintiffs' opposition. The briefing schedule for Plaintiffs' anticipated motion to amend the operative complaint and Defendants' cross-motion to compel arbitration of the claims in Plaintiffs' requested amended complaint is modified as follows: Plaintiffs' motion to amend the operative complaint is due by March 21, 2025; Defendants' opposition and cross-motion to compel arbitration is due six weeks after the date of service of Plaintiffs' motion; Plaintiffs' reply in support of their motion and opposition to Defendants' cross-motion is due two weeks after the date of service of Defendants' opposition and cross-motion; and Defendants' sur-reply in opposition to Plaintiffs' motion and reply in support of Defendants' cross-motion is due one week after the date of service of Plaintiffs' reply and opposition.

Because the deadline for Defendants' motion to dismiss the operative complaint and to compel arbitration has been extended to March 7, 2025, the pending motion that Defendants filed on March 3, 2025 is dismissed as moot. Defendants may re-submit the same motion on March 7, 2025 if they do not wish to make any changes after a review of Plaintiffs' unredacted exhibits.

The Clerk of Court is directed to terminate the motions pending at Dkt. Nos. 55, 56, and 57.

SO ORDERED.

Dated: March 4, 2025  
 New York, New York

  
 GREGORY H. WOODS  
 United States District Judge